## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	)	
	)	Chapter 11
KAISER GROUP INTERNATIONAL,	)	•
INC., et al.	)	Case Nos. 00-2263 to 00-2301 (MFW)
	)	, ,
Debtors	)	(Jointly Administered Under
	. )	Case No. 00-2263 (MFW))

## EMERGENCY NOTICE OF APPEAL

PLEASE TAKE NOTICE that Claimant James D. Pippin and the Class of ICT Spectrum Claimants ("Spectrum Claimants") appeal under 28 U.S.C. § 158(a) from the Order entered in this case by the Honorable Mary F. Walrath, Bankruptcy Judge, on June 2, 2005, denying Claimants' Motion for a Stay of the De-Registration of Kaiser Group Holdings Common Stock Pending the Final Disposition of the Bankruptcy Court's February 2, 2004 Order, a copy of which is attached as Exhibit A.

PLEASE TAKE FURTHER NOTICE that the Spectrum Claimants are filing this appeal on an emergency basis and by motion will request the District Court to take expedited action on the ground that, to avoid irreparable harm, relief is needed in less time than would normally be taken by the District Court to consider a bankruptcy appeal.

The names of the parties to the Order appealed from and the names and addresses of their respective attorneys are as follows:

Party: Debtors Kaiser Group International, Inc., et al.

G. Christopher Meyer, Esquire Squire, Sanders & Dempsey L.L.P., 4900 Key Tower 127 Public Square Cleveland, OH 44114 Phone: (216) 479-8500

Co-Counsel for Debtors

Mark Minuti, Esquire Saul Ewing LLP 222 Delaware Avenue, Suite 1200 P.O. Box 1266 Wilmington, DE 19899 Phone: (302) 421-6800 Co-Counsel for Debtors

Dated: June 8, 2005

CHIMICLES & TIKELLIS LLP

By:

Pamela S. Tikellis (DE Bar # 2172)
A. Zachary Naylor (DE Bar # 4439)

One Rodney Square

P.O. Box 1035

Wilmington, DE 19899 Phone: (302) 656-2500

William R. Kane Michael S. Tarringer

MILLER FAUCHER and CAFFERTY LLP

One Logan Square, Suite 1700 18<sup>th</sup> and Cherry Streets

Philadelphia, PA 19103

Phone: 215-864-2800

Attorneys for Claimant Pippin and the Class